

**EPA Comments on Proposed Changes  
to the Programmatic EIS/EIR and Appendices  
draft December 1999**

**General notes:**

Assuming that the South Delta actions in the preferred alternative will be represented more generically (i.e., no longer is the barrier alternative the solution presented in the PPA), we will need to make appropriate changes throughout the text. We would retain barrier impact information (e.g., the text in sec 6.1.8.1 p 6.1-51)-- but dissociate it from the PPA.

There has been some discussion of revising the Phase II Report. As a status report on the progress toward completing this programmatic phase, the Report would have no function for the Final. We need to consider whether elements of the Phase II report should, effectively, be absorbed into Program documents -- e.g., Implementation and Finance, or the Record of Decision. What subjects would not fit into other Final documents? Which, such as CMARP, need substantial refinement but are not critical at the Programmatic documentation level? Would the Report preview the next Stage?

The text changes for Program Elements do not include implementation details -- e.g., action priorities and schedule. Would this information be packaged in an overall Implementation Plan? We are concerned that this information needs to be pulled together and available for review.

**Specifics:**

P 1-6, Section 1.2: As a long-term planning and implementation program (if we optimistically look to future phases), it is not accurate to limit the CF Program per se to the general, programmatic direction we're focused on in Phase II. Suggest rewording the first sentence as follows:

The CALFED Phase II Program Plan does not involve ....

5.1.7.3, p 5.1-35: Para 2, second sentence (beginning "Reduced clear-cutting...") is confusing because it is not clear whether the current condition is with or without forested areas. Suggest substitute:

Clear-cutting and logging increase net runoff from previously forested areas and result in substantial fluctuations in runoff. By retaining vegetation, increased runoff would not occur; additionally, increased fluctuations in runoff over short and long term periods are avoided, making... (etc.)

5.3.7.1, p 5.3- 24-25 (7 of 19): The conclusion that increased TOC in the delta as a result of ERP implementation "could substantially affect municipal water supply" has been removed. Now the text states that any adverse changes in TOC and salinity attributable to ERP would be small compared with the beneficial changes from storage and conveyance in the preferred alternative. However, pp 10ff (as alternatives are discussed) state that the major source of TOC at the pumps is in-delta return drainage, and for that reason the through delta conveyance alternative would have limited effects on TOC concentrations. Rather, the control of carbon at the source (drainage treatment) might be needed; this is tested in early PA implementation. Thus, is the conclusion about the value of conveyance in addressing TOC in the PA inaccurate or incomplete? shouldn't implementation of the Water Quality element be cited?

6.1.8.1 pp 6.1-52-53: Several references are made to 6.1.2 areas of controversy (relating to the Hood diversion), although no revised text for this section is included in the draft. Are revisions being entered for 6.1.2?

6.1.8.4, p 6.1-54: The Delta Cross Channel paragraph is confusing. According to the first sentence, the subject is Alternative 3 impacts, but the following sentence moves into operations for the PPA. Are the operations the same? Which alternative is under discussion?

7.1 revisions, third page (as an example; see also 7.3) The final paragraph on target acreage for flooded or cooperatively managed ag lands should be rounded to nearest 1000. Use rounding consistently.

7.10.10 page 7.1-24 New text mentions "Supplemental Water Supply" as a project with potential to increase water supplies to CVP contractors. This is the first I've seen formal mention of this "study." Does the CF cumulative actions list include the Supplemental Water Supply project?

Transfers page 3 Reader feedback: More work is needed on the still confusing Terminology sidebar— if the decision is to keep the "real," "new," and "paper" terms. Perhaps it would be better to focus on discussion of circumstances of "injury" which would preclude or condition approval of a proposed transfer, and to explain how water is made available for transfer.